

# **EXHIBIT 7**

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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

- - -

CORY SPENCER, AN INDIVIDUAL; )  
DIANA MILENA REED, AN )  
INDIVIDUAL; AND COASTAL )  
PROTECTION RANGERS, INC., )  
A CALIFORNIA NON-PROFIT PUBLIC )  
BENEFIT CORPORATION, )

Plaintiffs, )

vs. )

No.: 2:16-cv-02129-SJO  
(RAOx)

LUNADA BAY BOYS; THE INDIVIDUAL )  
MEMBERS OF THE LUNADA BAY BOYS, )  
INCLUDING BUT NOT LIMITED TO )  
SANG LEE, BRANT BLAKEMAN, ALAN )  
JOHNSTON AKA JALIAN JOHNSTON, )  
MICHAEL RAE PAPAYANS, ANGELO )  
FERRARA, FRANK FERRARA, )  
CHARLIE FERRARA, ET AL., )

Defendants. )

- - - - - )

VIDEOTAPED DEPOSITION OF

CHARLES FERRARA

IRVINE, CALIFORNIA

JULY 7, 2017

Atkinson-Baker, Inc.  
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REPORTED BY: ANGELIQUE MELODY FERRIO, CSR NO. 6979

FILE NO: AB06A33

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UNITED STATES DISTRICT  
COURT CENTRAL DISTRICT OF  
CALIFORNIA WESTERN DIVISION

- - -

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MICHAEL RAE PAPAYANS, ANGELO )  
FERRARA, FRANK FERRARA, )  
CHARLIE FERRARA, ET AL., )

Defendants. )

----- )

Videotaped deposition of CHARLES FERRARA, taken  
on behalf of the Plaintiffs, at Premier Business Center,  
2600 Michelson Drive, Suite 1700, Irvine, California,  
92612, commencing at 9:36 a.m., Friday, July 7, 2017,  
before ANGELIQUE MELODY FERRIO, CSR No. 6979.

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11 ALSO PRESENT: GARY BOWDEN, VIDEOGRAPHER  
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WITNESS: CHARLES FERRARA

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1	IRVINE, CALIFORNIA, FRIDAY, JULY 7, 2017	
2	9:36 A.M.	
3	-000-	
4		09:35:44
5	THE VIDEOGRAPHER: Good morning. I'm	09:35:45
6	Gary Bowden, your videographer. And I represent	09:35:47
7	Atkinson-Baker, Incorporated, in Glendale,	09:35:50
8	California.	09:35:50
9	I'm not financially interested in this action	09:35:53
10	nor am I a relative or employee of any attorney or	09:35:56
11	any of the parties.	09:36:00
12	The date is July 7, 2017. And the time is	09:36:02
13	9:36 a.m. This deposition is taking place at	09:36:07
14	Premiere Business Center, 2600 Michelson Drive,	09:36:12
15	Suite 1700, Irvine, California.	09:36:15
16	This is case number 2:16-cv-02129-SJO (RAOx)	09:36:19
17	entitled Spencer versus Lunada Bay Boys. The	09:36:33
18	deponent is Charles Ferrara. And this deposition is	09:36:38
19	being taken on behalf of the Plaintiffs.	09:36:44
20	Counsel will now please introduce themselves.	09:36:49
21	After all counsel present have introduced themselves,	09:36:52
22	the witness will be sworn in by the court reporter.	09:36:55
23	This is the beginning of D.V.D. one,	09:36:59
24	Volume One. The D.V.D. is running and we're now on	09:37:00
25	the record.	09:37:03

1 MS. WOLFF: Good morning. Samantha Wolff on 09:37:04  
2 behalf of the Plaintiffs. 09:37:06

3 MS. HURLEY: Good morning. Alison Hurley on 09:37:07  
4 behalf of the witness, Charles Ferrara. 09:37:09

5 MS. MCLAUGHLIN: Kristin McLaughlin for 09:37:11  
6 Defendant Sang Lee. 09:37:11

7 MR. GLOS: Christopher Glos on behalf of the 09:37:13  
8 City and Chief Kepley. 09:37:17

9 MR. FIELDS: On the phone is Mark Fields, 09:37:23  
10 attorney for Angelo Ferrara and N.F. 09:37:26

11 MR. COOPER: Robert Cooper on behalf of the 09:37:30  
12 Defendant Brant Blakeman. 09:37:32

13

14 CHARLES FERRARA,  
15 having first been duly sworn, was  
16 examined and testified as follows:

17

18 EXAMINATION

19 09:37:44

20 BY MS. WOLFF: 09:37:44

21 Q. Good morning. 09:37:45

22 A. Good morning. 09:37:45

23 Q. Are you represented by counsel today? 09:37:46

24 A. Yes. 09:37:48

25 Q. And who is your counsel? 09:37:49

1	A. Ms. Bacon -- sorry.	09:37:50
2	MS. HURLEY: That's okay. Tiffany Bacon	09:37:56
3	works in my office.	09:37:58
4	BY MS. WOLFF:	09:38:00
5	Q. Are there any other attorneys representing	09:38:00
6	you other than what you just mentioned?	09:38:03
7	A. No.	09:38:05
8	Q. Can you please spell your name for the	09:38:05
9	record.	09:38:06
10	A. Charles Michael Ferrara, C-h-a-r-l-e-s,	09:38:06
11	M-i-c-h-a-e-l, F-e-r-r-a-r-a.	09:38:08
12	Q. Thank you.	09:38:16
13	Have you ever had your deposition taken	09:38:17
14	before?	09:38:19
15	A. No.	09:38:19
16	Q. Have you ever signed any written documents	09:38:20
17	like a declaration under penalty of perjury before?	09:38:22
18	A. No.	09:38:25
19	Q. Have you ever testified in court before?	09:38:26
20	A. No.	09:38:28
21	Q. So, since you're sort of new to all of this,	09:38:28
22	I'll go over some ground rules. I'm sure that your	09:38:34
23	attorney probably went over some with you, but just	09:38:37
24	so that you understand how the process works.	09:38:39
25	Now, you're under oath which is the same oath	09:38:42

1 in Palos Verdes Estates about this lawsuit? 09:42:07

2 A. No. 09:42:10

3 Q. Where do you currently live? 09:42:10

4 A. I live in San Pedro. 09:42:11

5 Q. And your address? 09:42:13

6 MS. HURLEY: I'm going to object on the right 09:42:15

7 to privacy. The witness can be contacted through my 09:42:15

8 office. 09:42:15

9 And I'll instruct him not to answer. 09:42:17

10 MS. WOLFF: That's fine. 09:42:18

11 BY MS. WOLFF: 09:42:19

12 Q. How long have you lived in San Pedro? 09:42:20

13 A. One year. 09:42:23

14 Q. And where did you live before that? 09:42:26

15 A. With my parents, Wildomar. 09:42:28

16 Q. What was that? 09:42:32

17 A. At my parents' house in Wildomar. 09:42:33

18 Q. Where did you grow up? 09:42:35

19 A. Palos Verdes. 09:42:37

20 Q. And how long did you live in Palos Verdes? 09:42:39

21 A. Until I was 17. So, um, from when I was born 09:42:43

22 to when I was 17. And I moved to Hawaii. And then I 09:42:52

23 came back and lived in Palos Verdes for another 09:42:56

24 couple of years. And then I moved to Redondo Beach. 09:42:59

25 Q. And how long did you live in Hawaii? 09:43:03

1 A. For almost two years. 09:43:06

2 Q. Do you remember the years that you were 09:43:07

3 there? 09:43:10

4 A. Yeah. It was, let's see, um, the end of '02, 09:43:10

5 like August of '02 to almost the end of almost '04, 09:43:15

6 like almost '05. 09:43:21

7 Q. What are your parents' names? 09:43:23

8 A. Lynn Ferrara and Frank Ferrara. 09:43:41

9 Q. And does your dad surf? 09:43:47

10 A. Yes. 09:43:51

11 Q. And what does he do for a living? 09:43:52

12 A. He's an auto wholesales man, he buys and 09:43:54

13 sells cars. 09:43:59

14 Q. Do you have any siblings? 09:43:59

15 A. Yes. 09:44:01

16 Q. What are their names? 09:44:01

17 A. Salvatore Ferrara and Felipa Ferrara. 09:44:02

18 Q. And where do they live? 09:44:06

19 A. Felipa lives in Hawaii. And Salvatore lives 09:44:10

20 in San Francisco. 09:44:13

21 Q. Do you have any children? 09:44:14

22 A. Yes. 09:44:17

23 Q. How many? 09:44:18

24 A. I have a son. He's ten months old. 09:44:18

25 Q. Congratulations. 09:44:22

1	A. Thank you.	09:44:24
2	Q. Your uncle is Angelo Ferrara and he's a	09:44:24
3	Defendant in this lawsuit; is that correct?	09:44:27
4	A. Yes, Ma'am.	09:44:29
5	Q. And what does he do for a living?	09:44:29
6	A. Auto body and paint, it's a body shop.	09:44:31
7	Q. Is he also a shaper?	09:44:35
8	A. Yes, but he's in auto body. He's an auto	09:44:38
9	body, he fixes cars and paints them.	09:44:41
10	Q. And your cousin is N.F., and you understand	09:44:44
11	that we're using his initials because when he was	09:44:49
12	first named in this lawsuit, he was a minor at the	09:44:51
13	time?	09:44:54
14	A. Yes.	09:44:54
15	Q. And he's also a Defendant in this lawsuit; is	09:44:55
16	that correct?	09:44:58
17	A. Yes.	09:44:58
18	Q. And is Leo Ferrara N.F.'s brother?	09:44:59
19	A. Yes.	09:45:04
20	Q. So, other than the conversation that you've	09:45:04
21	had with your father in the presence of your	09:45:14
22	attorneys, have you had any other conversations with	09:45:18
23	other family members about this lawsuit?	09:45:20
24	A. No.	09:45:22
25	Q. And aside from you and Felipa, have any of	09:45:22

1	Q. Have you ever been a party to a civil lawsuit	09:50:29
2	before this one?	09:50:32
3	A. No.	09:50:33
4	Q. And other than this lawsuit have you ever	09:50:33
5	been accused of bullying before?	09:50:36
6	A. No.	09:50:39
7	Q. Have you ever gotten into any physical	09:50:39
8	altercations?	09:50:42
9	A. No.	09:50:43
10	MS. HURLEY: Objection, over broad, vague and	09:50:43
11	ambiguous.	09:50:45
12	BY MS. WOLFF:	09:50:46
13	Q. And you know how to surf; is that correct?	09:50:46
14	A. Yes.	09:50:50
15	Q. When did you first learn how to surf?	09:50:50
16	A. Um, when I was ten years old.	09:50:53
17	Q. Who taught you how to surf?	09:50:56
18	A. My dad.	09:50:59
19	Q. Do you remember where you first learned how	09:51:01
20	to surf?	09:51:06
21	A. Torrance Beach.	09:51:07
22	Q. And when did you first surf at Lunada Bay?	09:51:09
23	A. Um, I actually remember this date,	09:51:15
24	October 16, 1994.	09:51:20
25	Q. Wow, how old were you at that time?	09:51:25



1	A. Ten.	09:51:30
2	Q. And why does that date stick out in your	09:51:30
3	mind?	09:51:33
4	A. Because it was exciting. I kind of finally	09:51:33
5	like was good enough to go up because there are rocks	09:51:36
6	and stuff and you can get really hurt.	09:51:39
7	So, it was just I remember it because it was	09:51:41
8	exciting, you know.	09:51:44
9	Q. It's an important day in your life?	09:51:45
10	A. Yeah, an important day.	09:51:47
11	Q. And before that your dad didn't want you to	09:51:48
12	surf there because it was too dangerous?	09:51:51
13	A. Yeah, the rocks. You have to be a pretty	09:51:53
14	good surfer to surf it. So, I would go to the beach	09:51:56
15	with sand and stuff. It's a lot safer, and then	09:52:00
16	finally.	09:52:03
17	Q. When he felt that you were good enough, he	09:52:04
18	let you go?	09:52:06
19	A. Yeah. You're safe enough, so, yeah.	09:52:06
20	Q. Okay. And then since that time have you	09:52:10
21	surfing there pretty consistently?	09:52:13
22	MS. HURLEY: Objection, vague and ambiguous,	09:52:16
23	if you understand.	09:52:19
24	THE WITNESS: Um, I mean, I surf there, yeah,	09:52:20
25	growing up I surfed there. And then I got some	09:52:24

1 surfing? 10:15:16

2 A. No. So, like I'm computer illiterate. I can 10:15:17  
3 barely open my E-Mail. It's terrible. 10:15:21

4 Q. Do you ever get text messages asking you to 10:15:25  
5 hangout at Lunada Bay? 10:15:28

6 A. No. 10:15:30

7 Q. And these texts, I'm sorry, you said phone 10:15:31  
8 calls with your dad about surfing at Lunada Bay, has 10:15:39  
9 he called you, would you say, in the past three 10:15:41  
10 years? 10:15:43

11 A. Well, before that I wasn't surfing because I 10:15:44  
12 had my injuries, but I would say in the last year 10:15:48  
13 since '15, '16, there has been a couple of times 10:15:53  
14 where I was at work and he would say, try to go 10:15:56  
15 straight after work. 10:15:59

16 It's worth it to come down. There's surf or 10:16:00  
17 I would drive by and say, dad, there are some waves. 10:16:03  
18 It looks like fun. That's basically it. 10:16:07

19 Q. How long is the drive from San Pedro to 10:16:10  
20 Lunada Bay? 10:16:13

21 A. Oh, it's like a good, it can be, if there's 10:16:14  
22 traffic on 25th Street, sometimes it can be like a 10:16:19  
23 half hour, you know, 35 minutes, but it's usually 10:16:23  
24 like 15 to 20 minutes. 10:16:29

25 Q. Do you communicate with Sang Lee by cell 10:16:31

1 phone? 10:16:43

2 A. No. 10:16:43

3 Q. Have you ever texted or called him? 10:16:44

4 A. Yes. I used to work with him like a few 10:16:47

5 years ago. We would do some -- he's a roofer. And 10:16:50

6 he had some work for me. So, I worked with him so. 10:16:55

7 Q. Do you recall approximately the dates that 10:16:59

8 you worked with him? 10:17:01

9 A. The years probably, let me think, um, 10:17:02

10 probably 2013 -- well, no, no, it's before that. So, 10:17:10

11 about 2008. And then 2014 a couple little side jobs. 10:17:23

12 That's pretty much it. 10:17:36

13 Q. It's just working with him kind of 10:17:37

14 sporadically? 10:17:40

15 A. Exactly. 10:17:41

16 Q. Other than talking about roofing jobs, it 10:17:42

17 sounds like were there any other times that you 10:17:44

18 communicated with Sang Lee? 10:17:47

19 A. No, no. 10:17:48

20 Q. And that was by text or phone? 10:17:49

21 A. Phone, I believe, phone. 10:17:52

22 Q. And have you communicated with any other 10:17:55

23 Defendant by phone in the past four years? 10:18:05

24 MS. HURLEY: Objection, lacks foundation, 10:18:07

25 calls for speculation, if you even know who the 10:18:09

1 Defendants are. 10:18:13

2 THE WITNESS: Yes, can I just look? 10:18:15

3 BY MS. WOLFF: 10:18:16

4 Q. Yes, please. 10:18:16

5 A. How many years is that? 10:18:17

6 Q. In the past four years? 10:18:18

7 A. Four years -- 10:18:20

8 MS. HURLEY: For the record the witness is 10:18:20  
9 referring to only the list of the Defendants on the 10:18:22  
10 caption that was part of Exhibit 266. 10:18:24

11 THE WITNESS: So, that would mean that I have 10:18:28  
12 talked with Sang Lee because that was in those four 10:18:30  
13 years about working. 10:18:32

14 Um, I don't talk to Brant. 10:18:35

15 I haven't talked to Alan. 10:18:40

16 I don't talk to Michael. 10:18:42

17 I've talked to my Uncle Angelo. 10:18:44

18 BY MS. WOLFF: 10:18:47

19 Q. You didn't talk to your Uncle Angelo? 10:18:48

20 A. No. I've talked to Angelo. 10:18:51

21 And I've talked to my dad. 10:18:54

22 And I've talked to Nick. 10:18:55

23 Q. And when you've had discussions with your 10:18:57  
24 Uncle Angelo was that about surfing at Lunada Bay? 10:19:08

25 MS. HURLEY: Objection, over broad, vague and 10:19:12

1 ambiguous. 10:19:14

2 THE WITNESS: No. It was about work. 10:19:14

3 BY MS. WOLFF: 10:19:16

4 Q. And the same question with respect to your 10:19:17  
5 Cousin Nick, was it ever about surfing? 10:19:21

6 A. No. It's about work. I'm trying to have him 10:19:25  
7 work with me a little bit. I'm trying to get him 10:19:29  
8 work. 10:19:32

9 Q. You're trying to get your Cousin Nick some 10:19:33  
10 work? 10:19:35

11 A. Yeah, a little work, yeah, so. 10:19:35

12 Q. I apologize if I have asked this before. I 10:19:40  
13 don't think that I have. 10:19:46

14 Have you ever E-Mailed any Defendant in this 10:19:47  
15 lawsuit related to surfing at Lunada Bay within the 10:19:49  
16 past four years? 10:19:53

17 A. No. 10:19:55

18 Q. Have you ever E-Mailed any Defendant in this 10:19:55  
19 lawsuit about non-locals accessing Lunada Bay in the 10:20:01  
20 last four years? 10:20:06

21 A. No. 10:20:07

22 Q. Do you know if there's a day each year when 10:20:07  
23 locals come together to pickup trash at Lunada Bay? 10:20:14

24 A. I've heard, I think, on Earth day. I don't 10:20:18  
25 know the exact date. We just naturally just try to 10:20:23

1	BY MS. WOLFF:	10:39:48
2	Q. Sure.	10:39:49
3	Do you think that anyone is welcome to surf	10:39:49
4	at Lunada Bay?	10:39:52
5	MS. HURLEY: Objection, lacks foundation,	10:39:53
6	calls for speculation.	10:39:55
7	THE WITNESS: Anybody can surf anywhere.	10:39:56
8	BY MS. WOLFF:	10:40:03
9	Q. And the same holds true for Lunada Bay?	10:40:03
10	A. Yeah, anywhere. It's not, anybody can go	10:40:07
11	anywhere.	10:40:10
12	Q. Have you ever been down at Lunada Bay and	10:40:11
13	seen police officers present?	10:40:17
14	A. Yes.	10:40:19
15	Q. On how many occasions would you say?	10:40:19
16	A. Quite a few times.	10:40:23
17	Q. Would you say more than ten?	10:40:25
18	A. More than ten, um, probably about, you know,	10:40:29
19	a dozen times maybe, a couple of times. You just see	10:40:39
20	them, not down on the rocks, are you talking about or	10:40:44
21	just on the top.	10:40:47
22	Q. First, let's talk about down on the rocks at	10:40:48
23	the beach?	10:40:51
24	A. Down on the rocks, okay, no, okay, then maybe	10:40:51
25	a handful of times.	10:40:55

1	Q. Maybe five or so times?	10:40:57
2	MS. HURLEY: Objection, misstates testimony.	10:40:59
3	BY MS. WOLFF:	10:41:02
4	Q. What's a handful then?	10:41:02
5	A. Six times, seven times.	10:41:04
6	Q. Down on the rocks at Lunada Bay?	10:41:07
7	A. Yeah, through all my years out there.	10:41:09
8	Q. Do you recognize any of the officers?	10:41:12
9	A. Um, I grew up in the area and so there are a	10:41:15
10	couple that I've seen, you know, just up at the top	10:41:20
11	making, I've seen driving around from being from	10:41:24
12	Palos Verdes.	10:41:28
13	So, of course there's, I've seen familiar	10:41:29
14	faces. I don't really know them.	10:41:32
15	Q. You don't know any of their names?	10:41:34
16	A. No. I don't know their names.	10:41:36
17	Q. And when you see them -- I'm sorry.	10:41:37
18	When you have seen them down at the, on the	10:41:39
19	rocks at Lunada Bay, were they there to hang out or	10:41:42
20	were they there for a specific reason in your	10:41:46
21	opinion?	10:41:48
22	MS. HURLEY: Objection, calls for	10:41:48
23	speculation, lacks foundation, vague and ambiguous,	10:41:50
24	over broad.	10:41:52
25	THE WITNESS: I don't know what they were	10:41:53

1 THE VIDEOGRAPHER: This will mark the start 11:45:32  
2 of D.V.D. two, Volume One in the continuing testimony 11:45:34  
3 of Charles Ferrara. 11:45:37

4 We're back on the record at 11:45 a.m., 11:45:39  
5 Counsel. 11:45:43

6 BY MS. WOLFF: 11:45:43

7 Q. Have you ever heard of the term "takers" in 11:45:43  
8 the context of surfing at Lunada Bay? 11:45:48

9 A. No. 11:45:51

10 Q. Have you ever heard of the Palos Verdes 11:45:51  
11 Estates police conducting an undercover operation at 11:45:54  
12 Lunada Bay? 11:45:58

13 A. No. 11:45:59

14 Q. Have you ever heard from any local surfers 11:45:59  
15 who were -- have you ever heard from any local 11:46:09  
16 surfers that they had heard of a planned undercover 11:46:14  
17 operation at Lunada Bay? 11:46:18

18 A. No. ~~11:46:19~~

19 Q. Do you recall surfing at Lunada Bay on 11:46:20  
20 February 13, 2016? 11:46:27

21 A. Yes. 11:46:29

22 Q. And you were surfing that day; is that right? 11:46:30

23 A. Yes, yes. 11:46:37

24 Q. Was there any reason in particular that you 11:46:38  
25 decided to surf that day or the conditions were just 11:46:40



1 good? 11:46:45

2 A. The conditions were good. There was swell. 11:46:45

3 Q. So, did you receive a phone call or a text 11:46:47

4 message from anyone encouraging you to go to Lunada 11:46:50

5 Bay that day -- 11:46:54

6 A. No. 11:46:54

7 Q. -- or an E-Mail for that matter? 11:46:54

8 A. No. 11:46:56

9 Q. And you hung out on the patio at Lunada Bay 11:46:56

10 on that day; right? 11:47:00

11 MS. HURLEY: Objection, vague and ambiguous. 11:47:03

12 THE WITNESS: I was not hanging out. I went 11:47:05

13 to go surfing. 11:47:06

14 BY MS. WOLFF: 11:47:07

15 Q. Did you spend any time on the patio at 11:47:08

16 Lunada Bay on that day? 11:47:13

17 A. That's where I got ready near the patio to go 11:47:14

18 surfing. 11:47:18

19 Q. And do you recall what time of day that you 11:47:19

20 were there on that day? 11:47:23

21 A. It was the morning. It was like maybe 7:30 11:47:24

22 or 8:00. 11:47:30

23 Q. And at some point Alan Johnston and Brant 11:47:32

24 Blakeman were at the patio as well; is that right? 11:47:35

25 A. Yes. 11:47:38

1 Q. And when they came into the patio where were 11:47:39  
2 you? 11:47:44

3 A. I was on the top side, kind of just getting 11:47:44  
4 ready to go out. I put my wet suit, I had my wet 11:47:49  
5 suit already on. And I was getting ready to go 11:47:53  
6 surfing. I was kind of looking at the ocean seeing 11:47:56  
7 where I was going to paddle out exactly. 11:48:00

8 Q. Was anyone else at the patio at that time? 11:48:03

9 A. Yes. 11:48:06

10 Q. The Plaintiff? 11:48:12

11 A. I saw the Plaintiff there, yeah. 11:48:12

12 Q. Diana Reed? 11:48:15

13 A. Yeah, I saw her and one other, another one of 11:48:16  
14 her friends. 11:48:19

15 Q. Was it a female or male? 11:48:19

16 A. Yeah, a female, yeah. I was just, I saw them 11:48:21  
17 and I said, hi, good morning. I didn't know who they 11:48:27  
18 were, just good morning. 11:48:31

19 And then I was going surfing. And as I was 11:48:33  
20 getting ready to go out, I saw Brant and Alan walking 11:48:37  
21 up to the patio. 11:48:42

22 Q. And do you recall what the other woman looked 11:48:43  
23 like who was with Diana Reed? 11:48:45

24 A. I believe she had darker hair. That's about 11:48:48  
25 it. 11:48:52

1 Q. Do you recall if Alan Johnston was carrying a 11:48:52  
2 case of beer when he was coming into the patio that 11:48:58  
3 day? 11:49:01  
4 A. I don't recall. 11:49:01  
5 Q. Do you recall if the Defendant Johnston said 11:49:02  
6 anything to Ms. Reed when he came onto the patio that 11:49:07  
7 day? 11:49:10  
8 A. I don't recall. 11:49:10  
9 Q. Do you recall if he was being loud and 11:49:11  
10 aggressive towards Ms. Reed that day? 11:49:16  
11 MS. HURLEY: Objection, vague and ambiguous, 11:49:18  
12 lacks foundation. 11:49:20  
13 THE WITNESS: I don't recall. 11:49:21  
14 BY MS. WOLFF: 11:49:22  
15 Q. Do you remember if you got any impression 11:49:23  
16 that Alan Johnston was trying to intimidate Ms. Reed 11:49:27  
17 that day? 11:49:30  
18 A. No. 11:49:30  
19 Q. Did you observe Alan Johnston spray Ms. Reed 11:49:31  
20 with his beer, either intentionally or 11:49:38  
21 unintentionally? 11:49:41  
22 A. No. 11:49:42  
23 Q. And what was Brant Blakeman doing during this 11:49:43  
24 time? 11:49:49  
25 MS. HURLEY: Objection, vague and ambiguous, 11:49:49

1 during what time? 11:49:51

2 BY MS. WOLFF: 11:49:52

3 Q. During the time that you were on the patio? 11:49:53

4 MS. HURLEY: Objection, misstates testimony. 11:49:54

5 THE WITNESS: I don't know. I was going 11:49:56

6 surfing. I was concerned about what, how the surf 11:49:57

7 was. Like I said, where I was going to paddle out 11:50:01

8 for my safety. 11:50:06

9 I know that I only had a small time frame to 11:50:07

10 go surfing because I had to get back up to work. So, 11:50:11

11 I wasn't even concerned with -- I was just concerned 11:50:14

12 with I have got a small window here to surf. Let me 11:50:17

13 go surfing and that's it. 11:50:19

14 BY MS. WOLFF: 11:50:21

15 Q. So, do you recall if Brant Blakeman was using 11:50:22

16 a video camera to film while he was on the patio that 11:50:25

17 morning? 11:50:29

18 A. I don't recall. 11:50:30

19 Q. Have you ever seen Brant Blakeman with a 11:50:33

20 video camera to film while he's at Lunada Bay? 11:50:40

21 A. I don't recall that, no. 11:50:45

22 Q. Do you remember hearing Ms. Johnston -- 11:50:47

23 sorry. 11:50:57

24 Do you remember Alan Johnson telling Ms. Reed 11:50:57

25 that she was hot? 11:51:02

1 A. I don't recall that. 11:51:02

2 Q. Do you remember him telling Ms. Reed that she 11:51:03  
3 was fucking sexy? 11:51:07

4 A. I don't recall that. I heard a couple, I 11:51:08  
5 just heard like a conversation, but I was going 11:51:11  
6 surfing, like I said. So, I was on the other side. 11:51:14

7 I wasn't getting involved in that at all. I 11:51:17  
8 just was, I had like I said, I had a small time to go 11:51:19  
9 surfing and that was it. And I was concerned about 11:51:24  
10 getting out there, so. 11:51:27

11 Q. So, from where you were on the patio at the 11:51:28  
12 time that Mr. Johnston and Mr. Blakeman came onto the 11:51:41  
13 patio, about how far away from them were you seated? 11:51:45

14 MS. HURLEY: Objection, misstates testimony. 11:51:48

15 THE WITNESS: Um, pretty far, I mean, 11:51:52  
16 probably like 20 feet. I was going surfing and they 11:51:57  
17 were coming onto the patio. 11:52:02

18 And so I wasn't there, you know, maybe 11:52:03  
19 20 feet for a moment of time, you know. 11:52:08

20 BY MS. WOLFF: 11:52:11

21 Q. So, how long would you say that all three of 11:52:12  
22 you were on the patio at the same time? 11:52:14

23 MS. HURLEY: Objection, misstates testimony. 11:52:16

24 THE WITNESS: Um, how long would I say, gosh, 11:52:18  
25 maybe five minutes. 11:52:23

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1 BY MS. WOLFF: 11:52:25

2 Q. And during that five minutes were you in 11:52:26  
3 approximately the same area of the patio? 11:52:30

4 A. No. I was in the top corner going surfing, 11:52:33  
5 my stuff was above and they were below on the patio. 11:52:36  
6 I wasn't even on the patio. I was above on the 11:52:40  
7 patio. 11:52:42

8 Q. Were you sitting on the roof? 11:52:43

9 MS. HURLEY: Objection, misstates testimony. 11:52:46

10 THE WITNESS: No, not really. There's kind 11:52:47  
11 of a roof, I guess. 11:52:49

12 BY MS. WOLFF: 11:52:51

13 Q. And is the distance from where you were and 11:52:52  
14 where they were you said it's about 20 feet; is that 11:52:55  
15 right? 11:52:57

16 A. Yeah, maybe more, maybe like 30 because they 11:52:57  
17 were on the corner of the patio. And I was just 11:53:00  
18 above where you go down to go surfing and so, yeah. 11:53:03

19 Q. Do you recall hearing Alan Johnston 11:53:08  
20 mentioning that he saw Ms. Reed on the front of the 11:53:18  
21 L.A. Times that morning? 11:53:20

22 A. No. 11:53:21

23 Q. And had you seen the L.A. Times that morning 11:53:23  
24 before you had gone surfing? 11:53:29

25 A. No. 11:53:31

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1 Q. Do you recall hearing Alan Johnston telling 11:53:31  
2 Ms. Reed that he was big enough to get the job done? 11:53:36  
3 A. No. 11:53:41  
4 Q. Do you recall whether or not Mr. Johnston was 11:53:44  
5 acting in a sexually suggestive manner at the time? 11:53:49  
6 MS. HURLEY: Objection, calls for 11:53:52  
7 speculation, calls for expert opinion testimony, 11:53:54  
8 lacks foundation. 11:53:57  
9 THE WITNESS: I'm not aware of that. I don't 11:53:57  
10 know. 11:53:59  
11 BY MS. WOLFF: 11:53:59  
12 Q. Do you remember whether or not Alan Johnston 11:54:00  
13 changed into his wet suit in front of Ms. Reed? 11:54:05  
14 A. I'm not aware of that. I was surfing by that 11:54:09  
15 time. 11:54:12  
16 Q. Do you recall whether or not you saw any 11:54:12  
17 police present at time of this incident? 11:54:20  
18 MS. HURLEY: Objection, vague and ambiguous 11:54:23  
19 as to incident, lacks foundation, calls for 11:54:25  
20 speculation. 11:54:28  
21 THE WITNESS: Can you rephrase that. 11:54:28  
22 BY MS. WOLFF: 11:54:30  
23 Q. Sure. 11:54:30  
24 Were there any police down at the beach when 11:54:30  
25 you were sitting on the patio that morning? 11:54:33

1 A. That morning? 11:54:35  
2 Q. Right. 11:54:36  
3 A. No, there was not. 11:54:36  
4 Q. Were there any police at the top of the bluff 11:54:38  
5 when you were there when, sorry, when you were first 11:54:41  
6 arriving? 11:54:45  
7 A. When I first arrived, I didn't see anybody up 11:54:45  
8 there, I mean, I don't know. There could have been. 11:54:49  
9 Q. Do you recall whether or not Ms. Reed 11:54:52  
10 appeared frightened by her interaction with 11:55:02  
11 Defendants Johnston and Blakeman? 11:55:07  
12 MS. HURLEY: Objection, calls for 11:55:08  
13 speculation, lacks foundation, vague and ambiguous. 11:55:09  
14 MR. DIEFFENBACH: Also, assumes facts. 11:55:13  
15 THE WITNESS: I'm not aware of that. 11:55:16  
16 BY MS. WOLFF: 11:55:17  
17 Q. And did you say anything to Defendants 11:55:18  
18 Johnston or Blakeman or Ms. Reed while you were on 11:55:24  
19 the patio? 11:55:27  
20 A. No. 11:55:28  
21 Q. Okay. 11:55:29  
22 A. Besides I said, good morning, when I got 11:55:30  
23 there. 11:55:33  
24 Q. Other than that, you didn't speak to any of 11:55:33  
25 them? 11:55:36



1 A. No. 11:55:36

2 Q. Did you say "hi" to Alan Johnston when he 11:55:36  
3 walked onto the patio? 11:55:40

4 A. Did I say "hi" to them, I don't remember. I 11:55:41  
5 could have said hi. That doesn't seem like too 11:55:46  
6 farfetched, but I don't remember it. I was kind of 11:55:50  
7 in a hurry. 11:55:54

8 I was trying to get ready, get your wet suit 11:55:55  
9 on. The next thing, you know, trying to get out 11:55:58  
10 there, you know, so, I was like. 11:56:01

11 Q. And when you left to go surfing, were Alan 11:56:03  
12 Johnston and Brant Blakeman and Ms. Reed all still on 11:56:06  
13 the patio? 11:56:09

14 A. Yes. 11:56:10

15 Q. And how long would you say that you went 11:56:11  
16 surfing that morning? 11:56:21

17 A. Probably an hour and a half, two hours. 11:56:22

18 Q. And then after you were done surfing, you 11:56:27  
19 came back in and did you change out of your wet suit 11:56:30  
20 at some point? 11:56:34

21 A. I came back in, yes. And that's when there 11:56:35  
22 were two cops down there. And where I came in was a 11:56:38  
23 different spot from where I paddled out. 11:56:41

24 You can't get in there when the tide gets 11:56:44  
25 lower. So, they said, this girl wanted to, we have a 11:56:47

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1 couple of questions to ask you. 11:56:52  
2 She said that you said some things to her. 11:56:54  
3 Me and Alan have blonde hair, too. And we look kind 11:56:56  
4 of similar, sure, no sweat. 11:57:00  
5 And then I walked up to the point with the 11:57:02  
6 two police officers and she said, oh, no, that wasn't 11:57:04  
7 him. It's a different guy. So, that was basically 11:57:08  
8 it. 11:57:11  
9 Q. Do you recall the names of either officer? 11:57:12  
10 A. I think one -- no, I don't, sorry. 11:57:14  
11 Q. Can you describe what he looked like? 11:57:23  
12 A. One was a younger guy, a younger officer. 11:57:25  
13 And then one was a little older, you know. 11:57:30  
14 Q. Do you recall what color hair they had? 11:57:34  
15 A. They were both like one maybe was, was 11:57:36  
16 Caucasian. And the other one was maybe Hispanic a 11:57:40  
17 little bit or something. 11:57:44  
18 Q. Was the younger one or the older one 11:57:45  
19 Caucasian? 11:57:49  
20 A. The younger one. 11:57:49  
21 Q. Do you recall if -- excuse me. 11:57:51  
22 Do you recall if either officer greeted you 11:57:54  
23 by saying, hi, Charlie? 11:57:58  
24 A. No, they didn't, no. 11:57:59  
25 Q. Sorry, you don't recall or -- 11:58:00

1 A. They didn't. 11:58:03  
2 Q. They didn't greet you that way? 11:58:03  
3 A. No, they didn't greet me that way. 11:58:05  
4 Q. And did you cooperate with the police and 11:58:07  
5 tell them what you saw? 11:58:12  
6 A. Yes. 11:58:13  
7 Q. Did you recall what you told them? 11:58:14  
8 A. I don't, I mean, just that I was going 11:58:16  
9 surfing and that I said good morning to her and then, 11:58:22  
10 you know, it wasn't me. 11:58:26  
11 Alan and Brant, I guess, came on the patio 11:58:29  
12 and I guess they had some words or an exchange of 11:58:32  
13 words. And that's pretty much it what I told you 11:58:35  
14 guys today so. 11:58:38  
15 Q. Do you recall what the police asked you 11:58:39  
16 specifically? 11:58:41  
17 A. No, I don't recall. I think they, honestly, 11:58:45  
18 I think they were just, she said there was some blond 11:58:49  
19 hair kid that said something to her. 11:58:53  
20 So, they thought, oh, you're the blonde hair 11:58:55  
21 kid. She saw me, no, it's not him. And that was it. 11:58:58  
22 Q. Do you remember if Alan Johnston was in the 11:59:04  
23 water at the same time as you at any point that 11:59:07  
24 morning? 11:59:11  
25 A. I mean, I was surfing and then he came out. 11:59:11

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1 There was a lot of surf. It was just one of those 11:59:15

2 days that it was a pretty good surf. 11:59:18

3 There was a lot of surf. So, I didn't 11:59:20

4 physically see him. If you're coming down to go 11:59:22

5 surfing, there are a few other spots you can surf up 11:59:25

6 the point a little bit. So, I didn't physically see 11:59:28

7 him. 11:59:30

8 Q. Do you recall seeing anyone else in the water 11:59:31

9 that morning? 11:59:33

10 A. There was like, yeah, like probably, you 11:59:35

11 know, 15 guys surfing there. 11:59:38

12 Q. Do you remember any of their names from that 11:59:40

13 morning? 11:59:43

14 A. No, I vaguely, I mean, I don't know who was 11:59:43

15 out there exactly, but there were probably like 15 11:59:47

16 guys. 11:59:50

17 Q. Do you remember seeing Brant Blakeman in the 11:59:50

18 water that morning? 11:59:54

19 A. Um, you know what, he might have, yeah, I 11:59:55

20 think that he came out eventually like towards the 12:00:00

21 end, but like I said, there was a lot of surf. And I 12:00:03

22 didn't cross paths with him too much. 12:00:05

23 But he came down to go surfing. So, he 12:00:07

24 definitely went surfing, but I don't know exactly the 12:00:10

25 time frame that he went surfing. 12:00:13

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1 Q. Sure. So, aside from Brant and Alan who 12:00:14  
2 possibly went surfing that morning, do you remember 12:00:19  
3 anyone else who was there? 12:00:22

4 A. Do I remember, um, no, I don't. I mean, 12:00:24  
5 they're just people surfing. There are probably, 12:00:32  
6 yeah, not really. 12:00:38

7 Q. Fair enough. 12:00:39

8 And then at some point when the police 12:00:41  
9 finished speaking with you, you told Ms. Reed that 12:00:45  
10 you were sorry for what happened to her; is that 12:00:50  
11 correct? 12:00:53

12 MS. HURLEY: Objection, vague and ambiguous, 12:00:53  
13 lacks foundation. 12:00:57

14 THE WITNESS: I just told, um, the officers 12:00:58  
15 that I apologized for them having to come down the 12:01:02  
16 hill, the cliff, and go on the rocks and do all of 12:01:05  
17 that. 12:01:09

18 So, maybe she overheard that and she thought 12:01:09  
19 that I was saying I'm sorry to her, but I was kind of 12:01:13  
20 apologizing to the cops for having to go through all 12:01:16  
21 of that. 12:01:19

22 BY MS. WOLFF: 12:01:19

23 Q. So, you weren't apologizing to Ms. Reed? 12:01:19

24 A. No. I wasn't apologizing to Ms. Reed. I 12:01:23  
25 don't know what happened. What would I apologize, so 12:01:26

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1	whatever.	12:01:31
2	Q. Did you receive a group E-Mail about that	12:01:31
3	interaction with Ms. Reed and Alan Johnston and	12:01:35
4	Brant Blakeman at any point?	12:01:38
5	A. No.	12:01:40
6	Q. Did you receive a group text about that	12:01:40
7	incident at any point?	12:01:43
8	A. No.	12:01:44
9	Q. And did you communicate with Alan Johnston	12:01:45
10	about that incident after it occurred?	12:01:48
11	A. No.	12:01:50
12	Q. Did you communicate with Brant Blakeman after	12:01:51
13	it occurred?	12:01:55
14	A. No.	12:01:56
15	Q. And did you communicate with anybody about	12:01:56
16	the incident after it occurred aside from the police	12:01:59
17	officers?	12:02:01
18	MS. HURLEY: And aside from conversations	12:02:02
19	that you had with attorneys.	12:02:03
20	MS. WOLFF: Of course.	12:02:04
21	THE WITNESS: No.	12:02:05
22	BY MS. WOLFF:	12:02:05
23	Q. So, I want to play for you a couple of short	12:02:06
24	videos that Brant Blakeman filmed from that morning.	12:02:16
25	And I'm just going to ask you a couple of questions	12:02:22

1	about them.	12:02:25
2	A. All right.	12:02:25
3	Q. The first one that I'm going to play is bates	12:02:26
4	number D-F-T point or period BB.000081.	12:02:29
5	MR. GLOS: Sorry, could you please just read	12:02:39
6	that again for me.	12:02:41
7	MS. WOLFF: Sure. It's D-F-T point	12:02:42
8	BB.000081. Sorry, one second.	12:03:03
9	Can you see that okay?	12:03:22
10	THE WITNESS: Yeah.	12:03:23
11	MR. GLOS: Have you seen this?	12:03:36
12		12:03:38
13	(Discussion held off the record.)	12:03:38
14		12:04:25
15	BY MS. WOLFF:	12:04:25
16	Q. That was the first video. Sorry, let me ask	12:04:25
17	you some questions about that one first.	12:04:29
18	A. Okay.	12:04:31
19	Q. Do you recall observing any of that	12:04:32
20	interaction?	12:04:35
21	A. No. That was obnoxious.	12:04:36
22	Q. Do you recall observing any of that?	12:04:38
23	A. No.	12:04:40
24	Q. So, you weren't present at that time?	12:04:40
25	A. I mean, I was getting ready to go surfing,	12:04:43

1	but I didn't see, like hear any of that. I heard	12:04:45
2	some things going on and that's, wow, I didn't know	12:04:49
3	exactly what was said, but it looked obnoxious to me.	12:04:54
4	Q. And is that Alan Johnston in the video?	12:04:59
5	A. Yeah.	12:05:01
6	Q. And is that the woman that you recall seeing	12:05:02
7	that day?	12:05:05
8	A. Yeah, yeah, and the friend with her.	12:05:05
9	Q. And after watching that video, does that	12:05:12
10	change any of your previous answers; does that	12:05:16
11	refresh your recollection in anyway?	12:05:18
12	A. No.	12:05:20
13	MS. HURLEY: Objection, over broad, yeah,	12:05:20
14	fine.	12:05:22
15	BY MS. WOLFF:	12:05:22
16	Q. No?	12:05:22
17	A. No.	12:05:23
18	MS. WOLFF: Okay. And then, sorry guys, I'll	12:05:26
19	play the other one.	12:05:28
20		12:06:29
21	(Discussion held off the record.)	12:06:29
22		12:06:30
23	MS. HURLEY: Was that a different bates	12:06:30
24	number?	12:06:32
25	MS. WOLFF: Yeah. Sorry. That was bates	12:06:32



1	D-F-T point BB.000082.	12:06:36
2	MS. HURLEY: Okay.	12:06:44
3	BY MS. WOLFF:	12:06:45
4	Q. Do you recall seeing that interaction that's	12:06:45
5	recorded on that video while you were there that day?	12:06:48
6	A. No.	12:06:51
7	Q. Had you gone surfing by then do you think?	12:06:51
8	A. Yeah, yeah.	12:06:54
9	Q. Okay. And again, that was Alan Johnston in	12:06:54
10	the video?	12:06:59
11	A. Yes.	12:07:00
12	Q. Did you hear Brant Blakeman's voice as well	12:07:00
13	in that video?	12:07:03
14	A. Yeah.	12:07:04
15	Q. And those were the two women that you recall	12:07:04
16	seeing that day as well --	12:07:07
17	A. Yes.	12:07:08
18	Q. -- in the video?	12:07:08
19	A. Uh-huh.	12:07:09
20	Q. And you spoke with Ms. Reed on another	12:07:10
21	occasion after that incident; didn't you?	12:07:17
22	A. No.	12:07:20
23	Q. That was the only time that you've ever	12:07:20
24	spoken with her?	12:07:23
25	A. Yeah.	12:07:25

1 Q. Have you ever seen her since then? 12:07:25  
2 A. I saw her one other time, yes. 12:07:28  
3 Q. Do you remember when that was? 12:07:30  
4 A. That was -- I don't remember. It was after 12:07:32  
5 that happened, a couple of months, maybe a month 12:07:40  
6 after. 12:07:43  
7 Q. And what was -- I'm sorry. 12:07:43  
8 Where did you see her? 12:07:47  
9 A. She was just down at the -- she was at the 12:07:48  
10 cliff where we surf down at the Bay and just sitting 12:07:52  
11 down there. 12:07:56  
12 Q. At the patio? 12:07:56  
13 A. Yeah. 12:07:58  
14 Q. And what were you doing that day? 12:07:58  
15 A. I was surfing. 12:08:00  
16 Q. Were you in the water when you saw her? 12:08:01  
17 A. No. I came in and I just saw her. She was 12:08:03  
18 sitting at the patio and that's all. 12:08:05  
19 Q. Did you go to the patio at all? 12:08:08  
20 A. No, but I kind of put my stuff by the patio. 12:08:10  
21 So, I just saw her there, you know. 12:08:13  
22 Q. And you didn't say anything to her? 12:08:15  
23 A. No, not one thing. 12:08:18  
24 Q. Was anyone else there that day on the patio? 12:08:19  
25 I'm sorry. 12:08:23

1 A. There were a couple of people. I don't know 12:08:23  
2 exactly who it was, but there were a couple of people 12:08:26  
3 there. 12:08:29

4 Q. On the patio with her? 12:08:29

5 A. On the patio, yeah. 12:08:30

6 Q. Do you recall who was there? 12:08:32

7 A. I don't recall who was there exactly, but I 12:08:33  
8 know that there were a couple of people. 12:08:36

9 Q. Do you know if they were people that you knew 12:08:38  
10 at the time or were they people that you had never 12:08:40  
11 seen before? 12:08:43

12 A. I don't know exactly. My stuff wasn't on the 12:08:45  
13 patio. She was, you know, there's not that many, 12:08:49  
14 she's pretty noticeable in the area. 12:08:53

15 I saw her, that was the girl that I saw that 12:08:56  
16 came down the other time. I got my stuff and went up 12:09:00  
17 the trail. That's what I usually do. 12:09:04

18 Q. So, you saw her when you were on your way in 12:09:06  
19 from surfing? 12:09:10

20 A. Yeah. 12:09:10

21 MS. WOLFF: So, Ms. Reed had a conversation 12:09:13  
22 with a surfer at Lunada Bay after the February 13th 12:09:15  
23 incident. And she recorded the conversation on her 12:09:20  
24 phone. 12:09:22

25 And there's only audio. There's not video to 12:09:23

1 A. No. I know that I've never surfed with him. 12:55:53

2 Q. And you don't think that you've ever seen him 12:55:56

3 at Lunada Bay? 12:55:59

4 A. No, I've never seen him at Lunada Bay. 12:56:00

5 Q. Okay. Do you know who Corey Spencer is, 12:56:01

6 outside of conversations with attorney? 12:56:04

7 A. I don't know him outside of conversations 12:56:06

8 with my attorney. 12:56:08

9 Q. Okay. Do you know who Ken Claypool is? 12:56:09

10 A. No. 12:56:13

11 Q. Do you know who Grace Claypool is? 12:56:13

12 A. No. 12:56:16

13 Q. Do you know who Jordan Wright is? 12:56:16

14 A. No. 12:56:19

15 Q. Have you ever been arrested? 12:56:19

16 MS. HURLEY: Objection, you can ask him if he 12:56:23

17 has ever had any felony convictions, but as to any 12:56:26

18 arrest, I'll go ahead and instruct him not to answer 12:56:29

19 as to the right of privacy. 12:56:32

20 BY MS. WOLFF: 12:56:34

21 Q. Have you ever had any convictions? 12:56:35

22 MS. HURLEY: Felony convictions is the only 12:56:36

23 response that he's giving. So, only felony 12:56:39

24 convictions you can answer. 12:56:42

25 THE WITNESS: No. 12:56:43

1 THE REPORTER: Counsel, do you want a copy  
2 of the deposition?

3 MR. GLOS: Yes.

4 MS. VU: No.

5 MR. DIEFFENBACH: Yes.

6 MS. MCLAUGHLIN: Yes.

7 MS. HURLEY: Yes.

8 MR. HAVEN: Yes.

9

10

11 (Whereupon, the deposition of  
12 CHARLES FERRARA commenced at  
13 9:36 a.m. and concluded at  
14 1:40 p.m.)

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1 STATE OF CALIFORNIA )  
2 )  
3 COUNTY OF LOS ANGELES )  
4  
5

6 I, the undersigned, declare under penalty of  
7 perjury that I have read the foregoing transcript, and I  
8 have made any corrections, additions, or deletions that  
9 I was desirous of making; that the foregoing is a true  
10 and correct transcript of my testimony contained  
11 therein.  
12

13 EXECUTED this \_\_\_\_\_ day of \_\_\_\_\_,  
14 20\_\_\_\_\_, at \_\_\_\_\_, \_\_\_\_\_.  
15 (City) (State)  
16  
17  
18  
19

20 \_\_\_\_\_  
21 CHARLES FERRARA  
22  
23  
24  
25

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REPORTER'S CERTIFICATE

I, ANGELIQUE MELODY FERRIO, C.S.R. NO. 6979, a  
Certified Shorthand Reporter, certify:

That the foregoing proceedings were taken  
before me at the time and place therein set forth, at  
which time the witness was put under oath by me;

That the testimony of the witness and all  
objections made at the time of the examination were  
recorded stenographically by me and were thereafter  
transcribed;

That the foregoing is a true and correct  
transcript of my shorthand notes so taken.

I further certify that I am not a relative or  
employee of any attorney or of any of the parties, nor  
financially interested in the action.

I declare under penalty of perjury under the  
law of the State of California that the foregoing is  
true and correct.

Dated this 7th day of July, 2017.

\_\_\_\_\_  
Angelique Melody Ferrio  
CSR No. 6979

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REPORTER'S CERTIFICATION OF CERTIFIED COPY

I, ANGELIQUE MELODY FERRIO, CSR No. 6979, a  
Certified Shorthand Reporter in the State of California,  
certify that the foregoing pages are a true and correct  
copy of the original deposition of CHARLES FERRARA,  
taken on Friday, July 7, 2017.

I declare under penalty of perjury under the  
laws of the State of California that the foregoing is  
true and correct.

Dated this 7th day of July, 2017.

---

Angelique Melody Ferrio  
CSR No. 6979